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6 *Attorneys for Reflex Media Inc.
and Clover8 Investments Pte. Ltd.*

8 IN THE UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 REFLEX MEDIA, INC., a Nevada
11 corporation, *et al.*,

12 Plaintiffs,

13 v.

14 RICHARD EASTON LIMITED, a
Delaware corporation, *et al.*,

15 Defendants.

16 Case No. 2:20-cv-00051-GMN-EJY

17 **STIPULATION FOR DISMISSAL OF
18 UNRESOLVED CLAIMS**

19 Plaintiffs Reflex Media, Inc., and Clover8 Investments PTE. LTD. (collectively
20 “**Reflex**”), and Defendant Richard Easton, hereby stipulate to dismiss the outstanding,
21 unresolved claims from Reflex’s Complaint. This stipulation is based on the following facts:
22

- 23 1. Reflex filed this case on January 9, 2020, against the following defendants:
24
a. Richard Easton, an individual;
b. Richard Easton Limited, a Delaware corporation;
c. Maria Jose Diaz, an individual;
d. Nelida Tejeda Alvarez, an individual, and
e. Jorge Osbaldo Rodriguez, an individual.

25 (ECF 1.)

- 26 2. On December 28, 2020, default was entered against Richard Easton Limited.

(ECF 30.)

3. On April 29, 2022, default was entered against Maria Jose Diaz, Nelida Tejeda Alvarez, and Jorge Osbaldo Rodriguez. ([ECF 59](#).) Thus, Richard Easton is the only remaining defendant to this case.

4. On April 6, 2022, Reflex filed a Motion for Summary Judgment on Claims I-VII (the “*Motion*”). ([ECF 58](#).)

5. On November 21, 2022, the Court granted, in part, Reflex's Motion for Summary Judgment. ([ECF 68.](#))

6. Reflex did not move for summary judgment on its Eighth of Action (for Intentional Interference with Contractual Relations) or Ninth Cause of Action (for violations of the Computer Fraud and Abuse act).

The parties now hereby stipulate and agree, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, that Reflex's Eight and Ninth Causes of Action are dismissed. In light of the foregoing, the parties also request that the settlement conference scheduled for February 2, 2023, be vacated.

Respectfully submitted on December 20, 2022 by:

SF FIRM, LLP

/s/ **Mark L. Smith**
Mark L. Smith
Attorneys for Plaintiffs

/s/ Richard Easton
Richard Easton, personally

* * *

IT IS SO ORDERED.

Date: July 24, 202



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2022, the foregoing **STIPULATION FOR DISMISSAL OF UNRESOLVED CLAIMS** was served on the person(s) named below via email:

Richard Easton
450 Alton Road, Apt 2708
Miami, FL 33139
r@richardeaston.com

/s/ Jacob L. Fonnesbeck